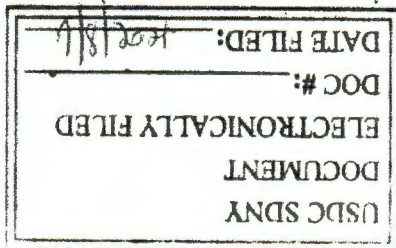


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Honorable Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

July 7, 2021

BY ECF

MEMO ENDORSED

Re: United States v. James Cahill
20 Cr. 521 (CM)

Dear Judge McMahon:

As the Court is aware, defendant James Cahill ("Cahill") is currently at liberty on a fully secured \$500,000 Appearance Bond that contains several conditions including home detention with location monitoring and travel restrictions. Earlier today, he filed a motion with the Court requesting that the home detention condition be replaced by a curfew and that location monitoring and all other release conditions remain intact. By this letter, Cahill separately respectfully requests permission to attend a birthday party for two of his grandchildren on July 10, 2021 at a home his son rented on Eastern Long Island from 12-8 pm. The government and Pretrial Services ("Pretrial") have been provided the address of the home. The attendees will be immediate family (Mr. Cahill's 3 children, spouses, and 9 grand kids). Pretrial, by United States Pretrial Service Officer Andrew Abbott, does not consent to this application due to his office's policy against permitting travel for social reasons by any defendant on home detention. The government, by Assistant United States Attorney Jason Swergold, defers to Pretrial's position.

Thank you for Your Honor's consideration of this request.

Very truly yours,
Sanford Talkin
Sanford Talkin

cc: AUSA Jason Swergold (by ECF)
AUSA Jun Xiang (by ECF)
AUSA Danielle Sassoon (by ECF)
SAUSA Laura de Oliveira (by ECF)
USPTO Andrew Abbott (by email)

7/7/2021 Denied. I am not going to make special rules for Mr. Cahill, who seems to get in with his party every week